



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

SK
F. #2016R02228

*271 Cadman Plaza East
Brooklyn, New York 11201*

March 3, 2021

By Email

Zachary Margulis-Ohnuma
Law Office of Zachary Margulis-Ohnuma
260 Madison Avenue, 17th Floor
New York, NY 10016

Re: United States v. Aleksandr Zhukov
Criminal Docket No. 18-633 (S-1) (EK)

Dear Mr. Margulis-Ohnuma:

The government provides the following supplemental discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure.

- In the course of preparing for the hearing scheduled for March 12, 2021, the government learned of additional statements made by the defendant to Bulgarian law enforcement authorities during the search of the defendant's apartment. The government encloses an FBI report memorializing these statements, Bates-stamped ZHU007492-ZHU007494 and designated SENSITIVE DISCOVERY MATERIAL. This report also constitutes early § 3500 material for government witness VD.
- The government previously advised you that it was in the process of obtaining the CV of one of its Russian interpreters. The government has obtained that CV and hereby provides it as 3500-BV-189.

The government also memorializes various prior disclosures made over the course of the last few weeks and months:

- On January 30, 2021, in response to a defense request, the government provided a five-page letter with further information regarding the experts that it may call in its case-in-chief and rebuttal case, including

for government experts LR, LL, VT, CG, JD, AB, and linguists IN, BV, MW, RF, and DK. The government also disclosed two additional CVs—3500-IN-13 and 3500-VT-10. The government also provided additional information regarding expected fact testimony from employees of certain platforms and cybersecurity firms. The government reiterates that, on January 8, 2021, the defense stated that it does not expect to call any expert witnesses in the defense case. Should the defense change its position, the government requests that the defendant provide the government with the identity of its expert witnesses and the summary and bases of their opinions.

- On December 28, 2020, the government disclosed, by USAFx, approximately 346 additional pre-marked trial exhibits.
- On January 4, 2021, the government disclosed, by USAFx, approximately 18 additional pre-marked trial exhibits.
- On January 26, 2021, the government provided written notice of its intent to introduce certain records from GoDaddy, DomainsByProxy, and the Internet Archive via certifications and provided copies of the certifications.
- On March 1, 2021, in response to a defense request, the government provided unredacted copies of ZHU000277, ZHU000278, and ZHU000279.

Please contact us if you have any questions or requests.

Very truly yours,

SETH D. DUCHARME
Acting United States Attorney

By: _____/s/
Saritha Komatireddy
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Enclosures

cc: Clerk of the Court (EK) (by ECF) (without enclosures)